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*Attorneys for The Fremont Street Experience  
Limited Liability Company*

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

KELVIN GORDON, an individual; LILITH  
MCGRATH, an individual; KIANA  
FULLMORE, an individual; and the  
AMERICAN CIVIL LIBERTIES UNION OF  
NEVADA FOUNDATION, INC., a domestic  
nonprofit corporation,

Plaintiffs,

v.

THE CITY OF LAS VEGAS, a local  
municipal government entity; and Fremont  
STREET EXPERIENCE, LLC, a domestic  
limited liability company;

Defendants.

Case No. 2:22-cv-01446-RFB-EJY

**STIPULATION AND ORDER  
EXTENDING TIME FOR PARTIES TO  
SUBMIT PROPOSED DISCOVERY  
PLAN AND SCHEDULING ORDER**

**(FIRST REQUEST)**

**STIPULATION**

The parties hereby agree and stipulate as follows:

1. Plaintiffs filed their Complaint for Declaratory and Injunction Relief on September 6, 2022 (ECF No. 1).
2. On September 19, 2022, Plaintiffs filed their Ex Parte Motion for Temporary Restraining Order and Motion for Preliminary Injunction (ECF Nos. 7 and 8, respectively).
3. On September 30, 2022, Defendant The Fremont Street Experience Limited

1 Liability Company (“FSE”) filed its Opposition to Motion for Temporary Restraining Order and  
2 Request for Expedited Discovery (ECF Nos. 15 and 19, respectively).

3 4. On October 3, 2022, Defendant City of Las Vegas (“CLV”) filed its Joinder to  
4 Opposition to Motion for Temporary Restraining Order (ECF No. 26).

5 5. On October 5, 2022, Plaintiffs filed their Reply to FSE’s Opposition to Motion for  
6 Temporary Restraining Order and Preliminary Injunction (ECF No. 32).

7 6. On October 8, 2022, FSE filed its Motion for Leave to File Supplemental Briefing  
8 on Plaintiffs’ Motion for Temporary Restraining Order (ECF No. 37).

9 7. On October 10, 2022, CLV filed its Answer to Verified Complaint for Declaratory  
10 and Injunction Relief (ECF No. 38).

11 8. On October 14, 2022, this Court entered a Stipulation and Order to Extend Deadline  
12 for FSE to Respond to Plaintiffs’ Complaint (ECF No. 41).

13 9. On October 17, 2022, Plaintiffs filed their Opposition to FSE’s Motion for Leave to  
14 File Supplemental Briefing on Plaintiffs’ Motion for Temporary Restraining Order (ECF No. 44).

15 10. On October 18, 2022, FSE filed its Reply Memorandum in Support of Motion for  
16 Leave to File Supplemental Briefing on Plaintiffs’ Motion for Temporary Restraining Order (ECF  
17 No. 46).

18 11. On October 19, 2022, FSE filed its Notice of Additional Facts re: Possible Recusal  
19 (ECF No. 47).

20 12. On October 19, 2022, CLV filed its Joinder to Reply Memorandum in Support of  
21 Motion for Leave to File Supplemental Briefing on Plaintiffs’ Motion for Temporary Restraining  
22 Order (ECF No. 48).

23 13. On October 20, 2022, FSE filed its Answer to Plaintiffs’ Verified Complaint (ECF  
24 No. 49).

25 14. On October 20, 2022, CLV filed its Joinder to Motion for Leave to File  
26 Supplemental Briefing on Plaintiffs’ Motion for Temporary Restraining Order (ECF No. 50).

27 15. The hearing related to the Notice of Additional Facts re: Possible Recusal (the  
28 “Notice”) was set for October 28, 2022 (ECF No. 52) was subsequently vacated (ECF No. 55). The

1 hearing on the Notice has yet to be rescheduled.

2 16. The current deadline for the parties to submit a proposed Discovery Plan and  
3 Scheduling Order is currently November 24, 2022.

4 17. The parties agree and respectfully request that this deadline be extended to January  
5 9, 2023. By extending this deadline, this will allow the parties to fashion a discovery plan and  
6 scheduling order after the Court rules on all pending motions.

7 18. This is the first request for an extension of this deadline.

8 19. This stipulation is made in good faith and the request is not made in attempt to delay  
9 proceedings.

10 DATED this 15<sup>th</sup> day of November, 2022.

DATED this 15<sup>th</sup> day of November, 2022.

11 /s/ Patrick J. Reilly

/s/ Christopher M. Peterson

12 Patrick J. Reilly, Esq.

Christopher M. Peterson, Esq.

13 Eric D. Walther, Esq.

Sophia A. Romero, Esq.

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17 *Attorneys for The Fremont Street Experience  
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*Attorneys for Plaintiffs*

18 DATED this 15<sup>th</sup> day of November, 2022.

19 /s/ Philip R. Byrnes

20 Philip R. Byrnes, Esq.

21 Bryan K. Scott, Esq.

22 John A. Curtas, Esq.

City Attorney's Office – Civil Division

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*Attorneys for The City of Las Vegas*

## **ORDER**

**IT IS SO ORDERED.**

DATED this \_\_\_\_\_ day of November, 2022.

UNITED STATES MAGISTRATE JUDGE